

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

|  |   |                                   |
|--|---|-----------------------------------|
| <b>FREEDOMROADS, LLC,</b>              | ) |                                   |
| <b>a limited liability company,</b>    | ) |                                   |
|  | ) |                                   |
| <b>Plaintiff,</b>                      | ) | <b>Case No. 9:22-cv-81305-DMM</b> |
|  | ) |                                   |
| <b>v.</b>                              | ) |                                   |
|  | ) |                                   |
| <b>MIDWEST ADVENTURE</b>               | ) |                                   |
| <b>BUILDS LLC, a limited liability</b> | ) |                                   |
| <b>company, and WALTER HOLEM,</b>      | ) |                                   |
| <b>an individual,</b>                  | ) |                                   |
|  | ) |                                   |
| <b>Defendants.</b>                     | ) |                                   |

\_\_\_\_\_ /

**NOTICE OF SUPPLEMENTARY JURISDICTIONAL FACTS**

Plaintiff, FreedomRoads, LLC, by and through its undersigned counsel, pursuant to this Court’s January 17, 2023 Paperless Order (“Order”), hereby gives notice of supplementary jurisdictional facts that demonstrates federal subject matter jurisdiction based on diversity, and in support states as follows:

1. On August 23, 2022, Plaintiff filed its Complaint against Defendants Midwest Adventure Builds LLC (“Midwest”) and Walter Holem (“Holem”) for breach of contract and unjust enrichment, among other claims. [DE 1].

2. Plaintiff alleges in the Complaint that it is a limited liability company organized under the laws of the State of Minnesota, with its principal place of business located at 250 Parkway Drive, Suite 270, Lincolnshire, Illinois 60069. [DE 1, Compl. ¶

1]. Plaintiff does hereby further expressly allege that it is a citizen of the State of Minnesota.

3. Plaintiff further alleges in the Complaint that Midwest is a limited liability company organized under the laws of the State of Florida, with its principal place of business located at 313 Datura Street, Suite 200, West Palm Beach, Florida 33401 and that Holem, who is Midwest's manager and registered agent, may be served at the same address. [DE 1, Compl. ¶¶ 2-3].

4. Pursuant to this Court's Order and controlling law, Plaintiff must plead the citizenships of all the members of FreedomRoads, LLC and Midwest Adventure Builds LLC. [DE 13]; *See Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C.*, 374 F.3d 1020, 1022 (11th Cir. 2004) (stating "[t]o sufficiently allege the citizenships of these unincorporated business entities, a party must list the citizenships of all the members of the limited liability company[.]").

5. According to the Order, Plaintiff must also plead the citizenship of Defendant Holem. [DE 13].

6. Plaintiff's sole member is FreedomRoads Intermediate Holdco, LLC, which is organized under the laws of the State of Minnesota and is otherwise a citizen of the State of Minnesota, with its principal place of business located at 250 Parkway Drive, Suite 270, Lincolnshire, Illinois 60069.

7. Holem is the sole member of Midwest and is a citizen of the State of Florida and resides at 885 Malcom Chandler Lane, Apartment 404, West Palm Beach, Florida 33401, where he was personally served with process in this action.

WHEREFORE, this action should proceed in the United States District Court for the Southern District of Florida as an action properly before it based on diversity of citizenship.

Respectfully submitted,

DEAN, MEAD, EGERTON,  
BLOODWORTH, CAPOUANO &  
BOZARTH, P.A.

*Attorneys for Plaintiff*

SEND MAIL TO:  
Dean, Mead, Egerton, Bloodworth,  
Capouano & Bozarth, P.A.  
Attn: A. Felipe Guerrero  
Post Office Box 2346  
Orlando, FL 32802-2346

By: /s/ A. Felipe Guerrero  
A. Felipe Guerrero, for the firm  
Florida Bar No. 022589  
Telephone 407-841-1200  
Facsimile 407-423-1831  
[fguerrero@deanmead.com](mailto:fguerrero@deanmead.com)  
[smarshall@deanmead.com](mailto:smarshall@deanmead.com)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 19, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to all CM/ECF participants.

s/ A. Felipe Guerrero

A. FELIPE GUERRERO